

[REDACTED]

From: CANB Emergency Filings
Sent: Monday, November 30, 2020 9:21 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Response to Objection to Claim # 2183 against PG&E - Bankruptcy Case No. 19-30088 (DM)

From: Duke Ross <dukeross77@gmail.com>
Sent: Wednesday, November 25, 2020 4:23 PM
To: CANB Emergency Filings <CANB-EMERGENCY-FILINGS@canb.uscourts.gov>
Subject: Fwd: Response to Objection to Claim # 2183 against PG&E - Bankruptcy Case No. 19-30088 (DM)

CAUTION - EXTERNAL:

In response to my responding to the PG&E denial of claim I was sent this email address by KBKLLP.com to file my objection with the court.

----- Forwarded message -----

From: Duke Ross <dukeross77@gmail.com>
Date: Wed, Nov 25, 2020 at 11:50 AM
Subject: Response to Objection to Claim # 2183 against PG&E - Bankruptcy Case No. 19-30088 (DM)
To: <PGEclaims@kbkllp.com>

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

Debtors, PG&E CORPORATION - and - PACIFIC GAS AND ELECTRIC COMPANY

Case No. 19-30088 (DM)

NOTICE OF THE REORGANIZED DEBTORS' FORTIETH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY/PASSTHROUGH CLAIMS)

Responder Info:

Name Duncan Ray Ross

Proof of claim # 2183

The amount of the claim \$27,084.00 was determined by getting a quote for delivery of the gravel needed to return the road to the condition it was in before PG&E, and/or it's subcontractors did the damage. It didn't include any labor cost because people on the road have the machinery and know how to spread the gravel.

Reasons why the Bankruptcy Court should not sustain the Omnibus Objection:

1. The damage was definitely caused by PG&E and/or it, subcontractors. They knew they were doing it at the time and they expressed numerous times that it would be fixed back to its original state.
2. I communicated with PG&E numerous times while this damage was being done and even had an PG&E employee, Robin Blue, come out and look at it and she agreed it was bad. I was repeatedly told that when the work was done the road would be returned to its original state. Then the Camp Fire happened, after the damage had been done, and before even more damage was done after the fire. I was then suddenly told, by Robin Blue, that I must file a claim in the bankruptcy court to get the road fixed. I submitted photos of the damage as part of my Proof of Claim.
3. Here is the relevant quotes from emails sent to me by PG&E to back up my assertions:

A:)

Van Etten, Don <DKV3@pge.com>

to me

Dear Mr. Ross,

Thank you for taking time to contact us about PG&E's wildfire safety work. PG&E is taking steps every day to improve the safety and reliability of our electric system. This includes working together with our customers and communities to manage vegetation that is located near power lines and could pose a safety concern. This wildfire safety work is focused on addressing overhanging branches and hazardous trees that have the potential to come into contact with lines. We very much appreciate your interest and feedback.

In response to your question,.... Sorry to hear about the damage to your road that appears to have been caused by the use of heavy-equipment. A couple options: 1.) Certainly feel-free to seek out one of the area Crew-Supervisors and show them the damage first hand and see if they have a potential solution. 2.) If you're not satisfied with what they have to say please contact our Call-Center and request a 'Claim-Form' from one of the representatives which should be able to provide a (hopeful) financial resolution for you to get the repairs made.

If there are any additional questions I can help answer, please let me know. You can reach me directly at # (916) 472-2310 or dkv3@pge.com. You can also learn more at pge.com/wildfiresafety.

Thank you again for your time. We look forward to continuing to work with you and others in your community on this important wildfire safety work.

Sincerely,

Don Van Etten

Customer Outreach Specialist

Pacific Gas and Electric Company

(916) 472-2310

dkv3@pge.com

B:)

Coleman, Joshua <JK1G@pge.com>

to me

Duke,

Thanks for that information, it is much appreciated. We will be in touch.

Thanks,

Josh C.

From: Duke Ross <dukeross77@gmail.com>

Sent: Tuesday, April 02, 2019 5:05 PM
To: Coleman, Joshua <JK1G@pge.com>
Subject: Rambling Way road in Magalia

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

A little history:

Since the beginning of this work I expressed to the people doing the work that the road was getting all torn up and was told it would be fixed 'by someone' when all the work was done. Some contractors used tracked vehicles to do some tree work and that is like using a moving shovel on gravel roads. Most of the length of the road was actually widened anywhere from 1 to 3 feet by all the heavy equipment and tree work. With the widened, and torn up road every vehicle that used the road threw gravel outside the normal road. Some of this gravel is 5 feet from original road edge. Then the fire happened and everybody left. They came back for about 2-3 days later but then never came back. With the greatly thinned gravel on the road we got over a hundred potholes this winter. Luckily we have a few tractors on the road so we were at least able to get that semi-fixed when the rain slowed. Bottom line is that the original width of the road has about a 1/4 of the gravel it had before all this work started.

I did some calling and e-mailing trying to get status. After a few people I was directed to:

Robin Blue 916-819-7157

At first she said she had gone and seen road, it was BAD. She stated that PG&E would be back to finish work then she contacted me a couple of weeks later and said all the contracts had been canceled and those resources used for the Camp Fire. She told me I had to file a claim with the Bankruptcy Court because the work started before the fire. I have done that. I measured the 'new' road's square footage and looked up the minimum standard thickness for a gravel road and it was 6 inches. I did the math and made a claim for 666 cubic yards of gravel.

I realize how much the Camp Fire messed things up but PG&E is a private company that messed up a private road. It should be repaired by PG&E.

If there is going to be any communication about this matter I want it by e-mail to ensure I have a record.

Sincerely,

Duncan Ross

IMPORTANT NOTES: Robin Blue was the PG&E employee who came out, inspected the damage, and said it was BAD. She is also the one who contacted me and told me that she was sorry that I would now have to file a Bankruptcy claim to get this fixed.

This statement does not include the 5 to 10 direct conversations I had with people working on the tree clearing, who then directed me to the person supervising the work, who then always told me that when the work was done the road would be repaired.

I declare under penalty of perjury that I , Duncan Ross, have personal knowledge of the damage done and who did it.

Contact Information:

Duncan Ross

6341 Rambling Way

Magalia, California, 95954

530-873-3766

dukeross77@gmail.com

Person I believe can resolve this matter in my favor:

Robin Blue 916-819-7157

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.